

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION - CANTON

IN RE: ) CHAPTER 13  
 )  
MATTHEW THOMAS SCHAEFER ) CASE NO. 18-62370  
JENNY LYNN SCHAEFER )  
Debtors ) JUDGE RUSS KENDIG  
 )  
 ) **OBJECTION TO CONFIRMATION**  
 ) **OF THE CHAPTER 13 PLAN**  
 )  
 ) \*\* PROPERTY ADDRESS  
 ) 181 Clare Rd  
 ) Ontario, Ohio 44906

Now comes PENNYMAC LOAN SERVICES, LLC ("PennyMac") a creditor herein holding a secured claim on the residence of the debtors and hereafter, pursuant to 11 U.S.C., Section 1324 objects to the confirmation of the within Chapter 13 plan for the reasons set forth:

1. The debtors are in possession and use of the property and are unable or have not been given adequate protection against further deterioration or depletion of the property which is secured by the mortgage of PennyMac, including but not limited to the payment of real estate taxes and maintenance of adequate insurance.
2. There is no equity in the real estate which is secured by the mortgage of PennyMac, or, if there is equity, it is of insignificant value.

3. The Chapter 13 Plan fails for provide for the claim of the secured creditor.

4. The Objection that is raised herewith is a standing Objection and shall continue with reference to the currently proposed plan and any subsequently modified plan or plans.

WHEREFORE, Creditor prays that this Court deny confirmation of the Debtor(s) proposed Chapter 13 Plan.

/s/ Cynthia A. Jeffrey  
Reimer Law Co.  
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Edward A. Bailey #0068073  
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**Notice**

Parties in interest shall take notice that the within Objection of PENNYMAC LOAN SERVICES, LLC to confirmation of Chapter 13 Plan shall come on for hearing on the 6th day of February, 2018 at 2:00 p.m., in conjunction with the 1st meeting of creditors in the within matter.

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**CERTIFICATE OF SERVICE**

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I certify that on February 5, 2019, a true and correct copy of the Objection to Confirmation was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

1. Office of the U.S. Trustee at (Registered address)@usdoj.gov
2. Dynele Schinker-Kuharich on behalf of the Chapter 13 Trustee's office at DLSK@Chapter13Canton.com
3. Rebecca K Hockenberry, Esq. on behalf of Matthew Thomas Schaefer and Jenny Lynn Schaefer, Debtors, at rebecca@hockenberrylaw.com

And by regular U.S. mail, postage prepaid, to:

4. Matthew Thomas Schaefer and Jenny Lynn Schaefer, Debtors at 181 Clare Road, Mansfield, Ohio 44906
5. Richland County Treasurer's Office at 50 Park Avenue East, Mansfield, Ohio 44902

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